

EXHIBIT D

Declaration of Chief of
Nursing Theresa Wickham

EXHIBIT D

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARCELL WILLIAMS,

Plaintiff,
vs.

WARDEN OF SOUTHERN DESERT
CORRECTIONAL CENTER, et al.,

Defendants.

CASE NO. 2:20-cv-00639-RFB-BNW

**DECLARATION OF CHIEF OF
NURSING, THERESA WICKHAM**

I, Theresa Wickham, hereby declare based on personal knowledge and/or information and belief, that the following assertions are true.

1. I am currently employed by the Nevada Department of Corrections (NDOC) as Chief of Nursing Services for the NDOC. As part of my regular duties, I oversee inmate health care at each institution within the NDOC system.

2. In my capacity as Chief of Nursing Services for the NDOC, and at the request of Chief Deputy Attorney General D. Randall Gilmer, I have reviewed the documents marked as **Exhibits A, J, and M**, that I understand will be used in case number 2:20-cv-00639-RFB-BNW in the United States District Court for the District of Nevada. After reviewing those records, I can attest that I was either a recipient or sender of each email and attachment contained in **Exhibit A**, and that those emails and attachments accurately reflect the policies and procedures in place regarding COVID-19 within the NDOC. I also attest that I was a recipient of to all staff memoranda written on official NDOC letter head

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1 by Deputy Director Harold Wickham (NDOC-COVID000017) and Director Charles Daniels
2 (NDOC-COVID000018-19), both dated March 16, 2020.

3 3. Through my employment as Chief of Nursing Services, I have access to
4 medical policies and directives maintained by the NDOC. With regard to the current
5 COVID-19 pandemic, I have been worked with Dr. Minev and other members of NDOC's
6 medical staff and administration to ensure that the protective protocols NDOC has
7 implemented are being consistently adhered to throughout all NDOC institutions.

8 4. As Chief of Nursing Services, I am both responsible for personally
9 participating in the visual and temperature screening tests of all individuals who enter any
10 NDOC facility, and am also assisting in the oversight of all NDOC employees tasked to
11 performing these crucial protective protocols.

12 5. I am also responsible for ensuring that the protocols more fully described in
13 the documents attached as exhibits reviewed by me and referenced above in ¶ 2 are also
14 used to monitor all inmates within the NDOC. Specifically, every inmate arriving at an
15 NDOC institution has their temperature taken as soon as they arrive onsite. They are also
16 asked whether they have any current symptoms of illness, recent travel, or know of any
17 potential contact with a COVID-19 positive patient.

18 6. The NDOC also requires all inmates transferring into any NDOC facility,
19 whether from another NDOC facility or from outside the NDOC, to be medically observed
20 and isolated from other inmates at the institution for a minimum of fourteen (14) days.
21 Each institution as specifically identified locations for these observations. During this time,
22 any symptoms that an inmate may have that are consistent with a potential COVID-19
23 infection, result in the inmate being quarantined from the other inmates until such time
24 as COVID-19 can be ruled out. At Southern Desert Correctional Center, inmates are
25 isolated in Unit 7, which is the quarantine and isolation unit. Any inmate that exhibits
26 symptoms consistent with a potential COVID-19 diagnosis are removed from Unit 7 and
27 observed in the medical building until they are symptom free.

28 . . .

